

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION

SADIE MAE HOLLEY, by and through her  
Mother and Next Friend, SARA B. HOLLEY,  
and SARA B. HOLLEY, Individually,

Plaintiffs,

v.

Case No. 4:16-cv-00017-EKD

CVS CAREMARK CORPORATION,  
CVS PHARMACY, INC.  
VIRGINIA CVS PHARMACY, LLC,  
CVS PHARMACY, STORE #3793,  
HOOK-SUPERX, LLC

Defendants.

**PETITION FOR COURT APPROVAL OF A COMPROMISE  
SETTLEMENT**

COME NOW Defendant, Virginia CVS Pharmacy, L.L.C., (*improperly  
pled as CVS Caremark Corporation, CVS Pharmacy, Inc, CVS Pharmacy,  
Store #3793, and Hook-SupeRx, LLC*), by and through its counsel, Clement  
Wheatley, and Plaintiffs, by and through their counsel, pursuant to  
Virginia Code Section 8.01-424, 1950 as amended, who respectfully  
petition this Court for approval of and consent to a compromise settlement  
of all claims for injuries and damages of Sadie Mae Holley, a minor, and in  
support thereof state as follows:

1. All interested parties approve the terms of the Compromise Settlement and consider them to be fair, reasonable, and in the best interest of Sadie.

2. The total amount of the settlement and the terms of distribution shall be set forth before the Court, *ore tenus*.

3. The persons or entities who are or may be interested in this proceeding are Everett Holley, natural father of Sadie Mae Holley, and Sara Beth Holley, natural mother of Sadie Mae Holley, each of whom has notice of this proceeding.

4. That a Guardian Ad Litem, Mark T. Williams, a discrete and competent attorney admitted to practice in this Court, has been appointed to protect the interests of the minor and hereby consents to said compromise settlement.

WHEREFORE, the Parties respectfully pray that the Court approve the Compromise Settlement; that the Court release and discharge Defendants from any and all liability to Plaintiff, Sadie Mae Holley, and/or her mother, and next friend, Sara Beth Holley, for the alleged injuries and resultant medical bills received by Sadie; and that the Court confirm its approval of the settlement by entry of an appropriate Order, and for such further relief as the Court may deem just and appropriate.

Respectfully submitted,

**VIRGINIA CVS PHARMACY, L.L.C.,  
and  
CVS PHARMACY, INC.,**  
*(Improperly Pled As CVS Caremark  
Corporation, CVS Pharmacy, Inc.,,  
and CVS Pharmacy, Store #3793,  
Hook-SupeRx, LLC)*

By Counsel

/s/ Sandra T. Chinn-Gilstrap  
Sandra T. Chinn-Gilstrap  
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(VSB No. 38587)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that the foregoing  
Petition for Court Approval of a Compromise Settlement was filed  
electronically with the Clerk this 3<sup>rd</sup> day of January, 2017, through this  
Court's CM/ECF system, which will provide notification to the following  
counsel for the Plaintiffs:

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